

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  
OLD LC, INC., *et al.*,

Debtors.

Official Committee of Unsecured Creditors of Old LC, Inc., *et al.*, for  
and on behalf of the estates of Old LC, Inc., *et al.*;

Plaintiff,

v.

Upfront V, LP, Breakwater Credit Opportunities Fund, L.P.; Upfront  
GP V, LLC; Mark Suster; Dana Kibler; Gregory Bettinelli; Saif  
Mansour; Aamir Amdani; Eric Beckman; Darrick Geant; and Joseph  
Kaczorowski.

Defendants.

Chapter 11  
Case No. 19-11791 (BLS)  
Jointly Administered

Adv. No. 20-51002 (BLS)

**MOTION AND ORDER FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 9010-1 and the attached certification, counsel moves the admission *pro hac vice* of James K.T. Hunter of Pachulski Stang Ziehl & Jones LLP, to represent Upfront V, LP, Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli in the above-captioned proceeding and any related adversary proceedings.

Dated: December 15, 2020

/s/ Colin R. Robinson

Colin R. Robinson (DE Bar No. 5524)  
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Kibler and Gregory Bettinelli*

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 9010-1, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of California, and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of these actions. I also certify that I am generally familiar with this Court's Local Rules and with Standing Order for District Court Fund revised 8/31/16. I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court for District Court.

Dated: December 15, 2020

/s/ James K.T. Hunter

James K.T. Hunter, Esquire (CA Bar No. 73369)  
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**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED counsel's motion for admission *pro hac vice* is granted.